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8 Attorneys for Defendant
HILTON GRAND VACATIONS INC.

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 RIBAL HAGE,
13 Plaintiffs,
14 v.
15 HILTON GRAND VACATIONS INC.,
16 Defendant.
17

Case No. 2:24-cv-01670-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

19 Plaintiff Ribal Hage ("Plaintiff") and Defendant Hilton Grand Vacations, Inc. ("HGV"),
20 hereby stipulate and agree to extend the time for HGV to file a response to the Complaint from the
21 current deadline of October 8, 2024, up to and including **October 29, 2024**.

22 The requested extension is necessary in light of the fact that HGV's counsel was recently
23 retained. The additional time will allow defense counsel to conduct a complete investigation into
24 the allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: October 2, 2024

Dated: October 2, 2024

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Gabriel A. Blumberg

/s/ Andrew S. Clark

8 Gabriel A. Blumberg, Esq.
Martin D. Holmes, Esq.
DICKINSON WRIGHT PLLC

Roger L. Grandgenett II, Esq.
Andrew S. Clark, Esq.
LITTLER MENDELSON, P.C.

9 *Attorneys for Plaintiff*
10 RIBAL HAGE

Attorney for Defendant
HILTON GRAND VACATIONS INC.

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12 **IT IS SO ORDERED.**

13 Dated: October 3, 2024

14 
15 UNITED STATES MAGISTRATE JUDGE

16 4866-0929-7899.1 / 116024-1026
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